

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

NICHOLAS WHITMAN,)	
)	
Plaintiff,)	Civil Action No. 5:24-cv-533
)	
v.)	
)	
U.S. DEVELOPMENT CORP.)	
d/b/a AKRO-PLASTICS,)	
)	
Defendant.)	

JOINT MOTION FOR DISMISSAL

1. Plaintiff, Nicholas Whitman, and Defendant, U.S. Development Corp., doing business as Akro-Plastics, (together, the “Parties”), hereby jointly move for the dismissal of the Complaint in the above-captioned civil action under Rule 41(a)(2) of the Federal Rules of Civil Procedure because the Parties have agreed to the Settlement Agreement attached hereto that fully resolves their underlying dispute.

2. Pursuant to the Settlement Agreement, the Parties jointly move the Court to dismiss the Complaint with prejudice, while retaining jurisdiction to enforce the terms of the Settlement Agreement.

3. Each Party shall bear its own costs and attorneys’ fees.

4. The Settlement Agreement and a proposed order for dismissal consistent with this joint motion are also attached to this motion.

Respectfully submitted, this 21st day of March, 2024.

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Assistant Attorney General
Civil Rights Division

KAREN D. WOODARD
Chief

By:

/s/ Joseph J. Sperber IV
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COUNSEL FOR DEFENDANT U.S.
DEVELOPMENT CORP., D/B/A AKRO-
PLASTICS

CERTIFICATE OF SERVICE

I hereby certify that on March 21, 2024, I electronically filed the Parties' Joint Motion for Dismissal via the CM/ECF system, which will cause a copy to be served on all counsel of record.

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Dated: March 21, 2024.

/s/ Joseph J. Sperber IV
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